

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

COMPLAINT

(for non-prisoner filers without lawyers)

2020 JAN 22 P 12: 46

STEPHEN C. DRIES
CLERK

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

Angel Chandler

v.

Case Number:

20-C-0101

(Full name of defendant(s))

(to be supplied by Clerk of Court)

UNITED PLUMBING & HEATING
SUPPLY COMPANY

A. PARTIES

1. Plaintiff is a citizen of WISCONSIN and resides at
(State)

4709 WEST CONGRESS STREET, MILWAUKEE, WI
(Address)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant UNITED PLUMBING & HEATING SUPPLY COMPANY
(Name)

is (if a person or private corporation) a citizen of WISCONSIN

and (if a person) resides at 9947 WEST CARMEN AVE (State, if known)
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for UNITED PLUMBING & HEATING SUPPLY COMPANY
9947 WEST CARMEN AVE (Employer's name and address, if known)
53225

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

I, Angel Chandler, would like to file suit
AGAINST UNITED Plumbing & Heating Supply company
for violating TITLE VII, the Americans with
Disabilities Act, the Genetic Information Non-
discrimination Act, or the Age Discrimination in
Employment Act; also ^{for} violating the Equal Pay
Act (EPA) when employed for almost 13 years.
The HR clerk for United, ^(Cherri Walton) Submitted a Non-FMLA
Leave of absence without my authorization to
avoid assisting a claim for a FMLA Leave
under the ADA Act. The clerk, Cheri Walton,

claimed that I did not qualify for a leave because they do not have to abide by FMLA. Cheri Walton submitted the Non-FMLA w/o my signature ^{on OCT. 11, 2017} My disability impaired my ability to perform any work at United P&H Supply. ~~Cheri Walton~~ ^{Cheri Walton} informed that I could not perform duties from home, but ~~was~~ instructed ^{me} to call in everyday while on leave to assist admin with Accounting duties that I was never paid for. ~~The company's~~ ^{The company's} ~~actions~~ actions affected my ability to return when the ~~Company~~ cancelled my health insurance knowing that I needed spinal surgery ^{for a large herniated disc.} This occurred Oct. 11, 2017 after residing ^{4 days} in hospital. The HR clerk never provided me with any benefit information. I believe these actions were in retaliation for complaining to upper management about the discrepancies of overtime pay and hostile environment.

C. JURISDICTION

☐ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ _____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

To pay back state funds for ^{medical} ~~any~~ appointments that should have been paid by Humana during Oct. 11, 2017 through Jan. 12, 2018 for cancelling medical insurance. Also, I want to be compensated for pain & suffering, and hindering my ability to return to work for these years. Their actions has affected me for the rest of my life.

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 22nd day of January 2020.

Respectfully Submitted,

[Signature]
Signature of Plaintiff

4147598381
Plaintiff's Telephone Number

chandlera30@gmail.com
Plaintiff's Email Address

4909 West Congress Street

MILWAUKEE, WI 53218
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE

☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.

☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.